

EXHIBIT 55

**REDACTED VERSION OF
DOCUMENT SOUGHT TO BE
SEALED**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

Case No.

UBER TECHNOLOGIES, INC.; 3:17-cv-00939-WHA

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

-----/

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF JOLIE SORGE

SAN FRANCISCO, CALIFORNIA

MONDAY, AUGUST 21, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2681037

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1 that we're doing this in [REDACTED], that 13:13

2 sounds reasonable. 13:13

3 MS. DEARBORN: Okay. 13:13

4 [REDACTED] [REDACTED] 13:13

5 [REDACTED] 13:13

6 [REDACTED] 13:13

7 MS. ROBERTS: Objection; form. 13:13

8 THE WITNESS: I haven't read the entire 13:13

9 contract, but that's what that implies. 13:13

10 MS. DEARBORN: Okay. 13:13

11 Q And then, in the next paragraph that says -- 13:13

12 there's a paragraph -- sorry. 13:13

13 Looking back at the page that ends -- where 13:13

14 the Bates number ends '14054. 13:13

15 A (Witness complies.) 13:13

16 Q There's a paragraph that says: 13:13

17 [REDACTED] 13:13

18 [REDACTED] 13:13

19 [REDACTED] 13:13

20 Do you see that paragraph? 13:14

21 A I do. 13:14

22 Q And it states that: 13:14

23 [REDACTED] 13:14

24 [REDACTED] 13:14

25 [REDACTED] 13:14

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 Do you see that? 13:14

12 A Uh-huh, yes. 13:14

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 MS. ROBERTS: Objection; form. 13:15

19 THE WITNESS: If we're sort of asking my 13:15

20 interpretation of this document, I mean, it can be 13:15

21 perceived that way, yes. 13:15

22 MS. DEARBORN: Okay. 13:15

[REDACTED]

[REDACTED]

[REDACTED]

1 MS. ROBERTS: Objection; form. 13:15

2 THE WITNESS: As you alluded to earlier, 13:15

3 legal documents are not always the easiest to 13:15

4 interpret. I guess that's one way of -- of 13:15

5 understanding the way this is written. 13:15

6 MS. DEARBORN: Q. Are you aware of another 13:15

7 way of understanding the way this is written? 13:15

8 A No. 13:15

9 Q Okay. Now, would you agree that this plan is 13:15

10 poorly constructed? 13:16

11 MS. ROBERTS: Objection; form. 13:16

12 THE WITNESS: I -- this is a lengthy 13:16

13 document. I understand it's a quite complex plan. My 13:16

14 opinion is that it may not have been the best plan 13:16

15 that we've put in place. 13:16

16 MS. DEARBORN: Okay. 13:16

17 Q And why not? 13:16

18 A Well, for one, it's quite lucrative, which is 13:16

19 great for the employee. I don't know. I can't -- I 13:16

20 can't comment in great detail. This is -- looks like 13:16

21 a 40- or 50-page document, so I'd have to read it 13:16

22 to -- to give you a real informed opinion. 13:16

23 Q Understand. 13:17

24 You -- you testified that your opinion is 13:17

25 that it may not have been the best plan that we've put 13:17

1 in place? 13:17

2 A Yes. 13:17

3 Q So I'm trying to understand why you say that. 13:17

4 A Yeah. Well, I -- for one, I -- when I was 13:17

5 perusing it, I saw that there was only a certain 13:17

6 number of employees on this plan. That's not to say 13:17

7 that there are more -- there weren't more employees 13:17

8 working at Chauffeur at the time. 13:17

9 [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED] [REDACTED]

13 Q Why would that be a problem if [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED]

15 MS. ROBERTS: Objection; form. 13:17

16 [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED]

19 MS. DEARBORN: Q. So why -- why would it not 13:17

20 be appropriate if there are [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED] 13:18

23 A I think you should all be working towards the 13:18

24 same objective and be compensated -- 13:18

25 Q Okay. 13:18

1 A -- fairly. 13:18

2 Q So -- 13:18

3 A Equitably, rather. 13:18

4 Q So, is the implication that [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

12 Q Okay. Yep. 13:18

13 MS. DEARBORN: So the court reporter -- I'm 13:18

14 sorry -- the videographer has marked as Exhibit -- 13:18

15 THE VIDEOGRAPHER: 1737. 13:18

16 MS. DEARBORN: -- 1737, a document bearing 13:18

17 Bates -- beginning Bates No. WAYMO-UBER-00047062. 13:18

18 (Document marked Exhibit 1737 13:18

19 for identification.) 13:19

20 MS. DEARBORN: Q. Ms. Sorge, do you 13:19

21 recognize this document? 13:19

22 A Not immediately. 13:19

23 Q Do you need a minute to read it? 13:19

24 A Yes, please. 13:19

25 Q No problem. 13:19

1 A (Witness reading document.) 13:19
2 Okay. 13:22
3 Q So Ms. Sorge, do you recognize this document? 13:22
4 A It has refreshed my memory, yes. 13:22
5 Q What is it? 13:22
6 A It's an exchange between myself, Chelsea, and 13:22
7 Stacy, who are all in HR. 13:22
8 Q Okay. And did all three of you at this time 13:22
9 have some responsibility for the Chauffeur team? 13:22
10 MS. ROBERTS: Objection; form. 13:22
11 THE WITNESS: My -- I was likely covering for 13:22
12 Chelsea while she was out, because she was the core 13:22
13 HRBP at this time for Chauffeur. 13:22
14 MS. DEARBORN: Q. So, in the e-mail that's 13:22
15 dated January 4th, 2016, at 5:25 p.m., that is -- 13:22
16 appears on the page where the Bates number ends 13:23
17 '47062. 13:23
18 A (Witness complies.) 13:23
19 Yes. 13:23
20 Q Do you see that? 13:23
21 A Yes. 13:23
22 Q You -- you write: 13:23
23 "Hey, Chelsea, below are some notes from my 13:23
24 meetings with [REDACTED] and [REDACTED] 13:23
25 Do you see that? 13:23

1 A I do. 13:23

2 Q So you met with [REDACTED] prior to him -- 13:23

3 or [REDACTED] on or about January 4th, 2016? 13:23

4 A Yes, that looks to be true. 13:23

5 Q And your meeting related to [REDACTED] 13:23

6 decision to leave the project -- or leave Project 13:23

7 Chauffeur? 13:23

8 A That -- that looks to be true. I don't 13:23

9 recall the specific meeting with [REDACTED] but it looks 13:23

10 like I met him. 13:23

11 Q And under -- well, first of all, who is [REDACTED] 13:23

12 [REDACTED] 13:23

13 A [REDACTED] was -- he was in operations for 13:23

14 Chauffeur. 13:23

15 Q And under -- there's -- there's two headers 13:23

16 that come next. The first is: 13:24

17 [REDACTED] 13:24

18 Do you see that? 13:24

19 A Yes. 13:24

20 Q And then it says: 13:24

21 "Reason for leaving." 13:24

22 Do you see that? 13:24

23 A Yes. 13:24

24 Q And the first bullet point is: 13:24

25 [REDACTED] [REDACTED] 13:24

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[REDACTED]

[REDACTED]

3 Do you see that? 13:24

4 A I do see that. 13:24

5 Q Do you recall a conversation with 13:24

6 [REDACTED] about this topic? 13:24

7 A I don't recall -- I don't recall our specific 13:24

8 conversation. But I do have some recollection of this 13:24

9 now, [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

12 But I don't remember anything beyond that. 13:24

13 Q You don't recall what [REDACTED] told you 13:24

14 about this? 13:24

15 A I only recall what is written here, which was 13:24

16 he felt like he would benefit from actually resigning. 13:24

17 Q And you see the third bullet point says he 13:25

18 would -- it says: 13:25

19 [REDACTED] [REDACTED]

[REDACTED]

21 Do you see that? 13:25

22 A Yes. 13:25

23 Q Do you recall [REDACTED] saying this to 13:25

24 you? 13:25

25 A I don't recall that part specifically. 13:25

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1 Q Do you have any doubt that he did say this, 13:25
2 based -- based on this document? 13:25
3 A Yeah, I have no doubt that he said that. 13:25
4 Q Okay. And you said you recall thinking that 13:25
5 [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED] 13:25
8 A (Witness nods head.) 13:25
9 Q Yeah. 13:25
10 [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED]
12 MS. ROBERTS: Objection; form. 13:25
13 [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED]
15 MS. DEARBORN: Q. Why not? 13:25
16 [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED]
20 Q Because Google has an interest in encouraging 13:26
21 people to stay with Google; right? 13:26
22 A That's right. 13:26
23 Q And if you look above that e-mail, there's 13:26
24 another e-mail that you wrote on Monday, January 14th, 13:26
25 2016, at 5:38 p.m. 13:26

1 Do you see that? 13:26

2 MS. ROBERTS: January 4th? 13:26

3 MS. DEARBORN: Thank you. I'm sorry. I 13:26

4 misspoke. 13:26

5 Q January 4th, 2016, at 5:38 p.m. 13:26

6 A Yes. 13:26

7 Q Do you see that? 13:26

8 A I do. 13:26

9 Q And the second paragraph in that e-mail 13:26

10 reads: 13:26

11 [REDACTED] [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 Do you see that? 13:26

15 A Yes. 13:26

16 Q And this is the -- the Chauffeur plan that 13:26

17 we've been discussing that was [REDACTED] 13:26

18 A Yes. Those allegedly were his words in this 13:26

19 e-mail, but yes. 13:26

20 Q Okay. His words were that the plan was 13:26

21 [REDACTED] 13:26

22 A Well, the way this reads is that his reason 13:26

23 for leaving is implying that [REDACTED] [REDACTED]

24 [REDACTED] 13:26

25 Q Did you agree that the plan was [REDACTED] 13:27

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5 Q Okay. You see the next sentence says: 13:27

10 A That's what I believe I meant by that, yes. 13:27

14 MS. ROBERTS: Objection; form. 13:27

15 THE WITNESS: Based on the e-mail pre- -- 13:27

16 preceding or -- I can't tell, actually -- yes, that 13:27

17 was the implication. 13:27

18 MS. DEARBORN: Okay. 13:27

19 Q So, returning to the e-mail that you wrote 13:27

20 dated January 4th, 2016, at 5:25 p.m., there's -- the 13:27

21 second bullet point under [REDACTED] reason for 13:27

22 leaving is: 13:27

25 A Yes. 13:28

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1 Q Are "L and S" Larry and Sergey? 13:28

2 A Yes. 13:28

3 Q And that would be Larry Page and Sergey Brin? 13:28

4 A Yes. 13:28

5 Q And John, is that John Krafcik? 13:28

6 A Yes. 13:28

7 Q And Chris, is that Chris Urmson? 13:28

8 A Yes. 13:28

9 [REDACTED] 13:28

10 [REDACTED] 13:28

11 [REDACTED] 13:28

12 [REDACTED] 13:28

13 [REDACTED] 13:28

14 [REDACTED] 13:28

15 [REDACTED] 13:28

16 A I don't. 13:28

17 [REDACTED] 13:28

18 [REDACTED] 13:28

19 [REDACTED] 13:28

20 Do you see that? 13:28

21 A Yes. 13:28

22 [REDACTED] 13:28

23 [REDACTED] 13:28

24 A I don't. 13:29

25 Q What was the product of Project Chauffeur at 13:29

CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript [x] was [] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

Dated: 8/22/2017

A handwritten signature in blue ink, appearing to read 'Andrea M. Ignacio', is written over a horizontal line.

ANDREA M. IGNACIO,

RPR, CRR, CCRR, CLR, CSR No. 9830